

Derby, Erin Rigney

From: Leonard Bennett [lenbennett@clalegal.com]
Sent: Monday, May 23, 2011 4:59 PM
To: Ostroff, Ethan G.
Cc: Matt Erausquin; Martin Thornthwaite; Miguel Eaton; John C. Bazaz; Lynch, John C.; Brian N. Casey; Vicki Ward
Subject: Re: Wilkes v. Experian et al. - deposition of Trans Union

Because TU is a third party. And because I am on vacation. Quit eating your client's money in nuisance emails. No humor intended.

Sent from my iPhone

On May 23, 2011, at 4:20 PM, "Ostroff, Ethan G." <Ethan.Ostroff@troutmansanders.com> wrote:

Hi Len-

While we certainly agree that such information is a trade secret, we are surprised to see a PO that does not specifically identify documents that are covered and instead is a blanket PO, which you were not willing to stipulate to with respect to GMAC's documents. Can you help us understand why you are willing to agree to this blanket PO for TU but not for GMAC?

Thanks,

Ethan

From: Leonard Bennett [mailto:lenbennett@clalegal.com]
Sent: Monday, May 23, 2011 4:17 PM
To: Ostroff, Ethan G.
Cc: Matt Erausquin; Martin Thornthwaite; Miguel Eaton; John C. Bazaz; Lynch, John C.; Brian N. Casey; Vicki Ward
Subject: Re: Wilkes v. Experian et al. - deposition of Trans Union

Because this is YOUR client's contract. Pricing etc is protectable. THAT is actually a trade secret.

Sent from my iPhone

On May 23, 2011, at 4:14 PM, "Ostroff, Ethan G." <Ethan.Ostroff@troutmansanders.com> wrote:

Hi Matt-

Thanks, we will participate by telephone and understand TU is setting up a conference bridge. Are you planning to provide your deposition exhibits prior to the deposition – thru Sharefile as previously done in this case or otherwise?

Also, I am confused by this protective order. Plaintiff's counsel has been unwilling to agree to a similar PO to cover GMAC's documents in this case. Can you please help us understand why Plaintiff is willing to agree to this PO for Trans Union?

Thanks,

Ethan

From: Matt Erausquin [mailto:matt@clalegal.com]
Sent: Monday, May 23, 2011 4:07 PM
To: Ostroff, Ethan G.; Martin Thornthwaite; Miguel Eaton
Cc: John C. Bazaz; Lynch, John C.; Brian N. Casey; Leonard Bennett; Vicki Ward
Subject: Re: Wilkes v. Experian et al. - deposition of Trans Union
Importance: High

Yes, the deposition is still going forward at 4pm EST. But we are all flying to California for it. (Did you get your flight yet?)

Also, the protective order covering third party materials is attached, incorporating language that requires the parties to handle the docs appropriately pending entry of the order. Please sign for GMAC and forward an electronic copy to Martin. The original signature sheet should come up to my office to go over to the Court for entry. Thanks.

--

Matthew J. Erausquin
Consumer Litigation Associates, P.C.
1800 Diagonal Rd, Suite 600
Alexandria, VA 22314
Tel. 703-273-7770
Fax. 888-892-3512

On May 23, 2011, at 4:02 PM, Ostroff, Ethan G. wrote:

Counsel-

Is the deposition of TU still occurring tomorrow? If so, does it start at 1pm EST or 1pm PST? Also, is there a conference call line that has been established to participate by phone?

Thanks,

Ethan

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<2011-5-10 - Witness Subpoena to Trans Union and Notice of Deposition.pdf>

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